

## Exhibit 6

IN THE UNITED STATES COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

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IN RE: NATIONAL PRESCRIPTION  
OPIATE LITIGATION, MDL No. 2804  
Case No. 17-md-2804  
Judge Dan Polster

This document relates to:

The County of Summit, Ohio et al. v.

Purdue Pharma L.P., et al.

Case No. 17-OP-45004

The County of Cuyahoga v.

Purdue Pharma L.P., et al.

Case No. 18-OP-45090

City of Cleveland, Ohio v.

Purdue Pharma L.P., et al.

Case No. 18-OP-45132

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VIDEOTAPED DEPOSITION OF VINCENT CARAFFI  
Wednesday, January 23, 2019, at 9:07 a.m.  
Cleveland, Ohio

Reported by:

Paula Raskin, CSR-4757

Ref. No. 3202797

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On Wednesday, November 19, 2018,  
commencing at approximately 9:07 a.m., the  
videotaped deposition of VINCENT CARAFFI, taken  
by Counsel for the Defendants, was held at the  
offices of Kelley & Ferraro, Ernst & Young  
Tower, 950 Main Avenue, Suite 1300, Cleveland,  
Ohio, before and stenographically reported by  
Paula S. Raskin, CSR-4757, Notary Public.

1 APPEARANCES:

2  
3 On behalf of Cuyahoga County and the Witness:

4 SCOTT ELLIOT SMITH LPA

5 5003 Horizons Drive, Suite 101

6 Columbus, Ohio 43220

7 (614) 486-4987

8 BY: SCOTT ELLIOT SMITH, ESQ.

9  
10 On behalf of Cardinal Health:

11 WILLIAMS & CONNOLLY LLP

12 725 Twelfth Street NW

13 Washington, DC 20005

14 (202) 434-5000

15 BY: PAUL E. BOEHM, ESQ.

16 pboehm@wc.com

17 BY: MELINDA K. JOHNSON, ESQ.

18 mkjohnson@wc.com  
19  
20  
21  
22  
23  
24  
25

1 APPEARANCES (Cont.):

2  
3 On behalf of the Teva Defendants

4 MORGAN LEWIS & BOCKIUS LLP

5 One Oxford Centre, Floor 32

6 Pittsburgh, Pennsylvania 15219

7 (412) 560-7455

8 BY: WENDY WEST FEINSTEIN, ESQ.

9 wendy.feinstein@morganlewis.com

10 -and-

11 MORGAN LEWIS & BOCKIUS LLP

12 77 West Wacker Drive

13 Chicago, Illinois 60601

14 (312) 324-1492

15 BY: ZACHARY LAZAR, ESQ. (Via Phone)

16 zachary.lazar@morganlewis.com

17  
18 On behalf of Johnson & Johnson and

19 Janssen Pharmaceuticals

20 TUCKER ELLIS LLP

21 950 Main Avenue, Suite 1100

22 Cleveland, Ohio 44113

23 (216) 696-3921

24 BY: CLIFFORD MENDELSON, ESQ.

25 clifford.mendelson@tuckerellis.com

1 APPEARANCES (Cont.):

2  
3 On behalf of Walmart

4 JONES DAY

5 901 Lakeside Avenue E

6 Cleveland, Ohio 44114

7 (216) 586-3939

8 BY: ADAM HOLLINGSWORTH, ESQ.

9 ahollingsworth@jonesday.com

10  
11 On behalf of Rite-Aid

12 MORGAN LEWIS & BOCKIUS LLP

13 1000 Louisiana Street, Suite 4000

14 Houston, Texas 77002

15 (713) 890-5472

16 BY: JAMES A. NORTEY II, ESQ.

17 james.nortey@morganlewis.com

18  
19 On behalf of AmerisourceBergen:

20 JACKSON KELLY PLLC

21 500 Lee Street East, Suite 1600

22 Charleston, West Virginia 25301

23 (304) 340-1018

24 BY: JILL McINTYRE, ESQ. (Via Phone)

25 jmcintyre@jacksonkelly.com

1 APPEARANCES (Cont.):

2  
3 On behalf of McKesson:

4 COVINGTON & BURLING

5 One CityCenter

6 850 Tenth Street, NW

7 Washington, DC 20001

8 (202) 662-6000

9 BY: MICHELLE L. YOCUM, ESQ. (Via Phone)

10 myocum@cov.com

11  
12 Appearing on behalf of the Endo Defendants

13 BAKER & HOSTETLER LLP

14 Key Tower, 127 Public Square

15 Suite 2000

16 Cleveland, Ohio 44114

17 (216) 621-0200

18 BY: RUTH E. HARTMAN, ESQ. (Via Phone)

19 rhartman@bakerlaw.com

20  
21  
22 ALSO PRESENT:

23 Gil Whitney - Video Technician

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(Exhibits attached to transcript.)

1 MR. SMITH: Objection; form.

2 A. Based upon my conversations with  
3 other individuals who would be able to answer  
4 that question, whether it be data, whether it be  
5 information based upon the increase in service  
6 providers as individuals who needing treatment,  
7 I can't answer that question.

8 My role as a chair of the Cuyahoga  
9 County Board of Health is to facilitate a local  
10 collaborative. I do not have a background in  
11 substance abuse. I can't answer that question.

12 Q. Mr. Caraffi, I'm not asking you to be  
13 an expert. I'm asking you factual knowledge  
14 that you have had and have here today, so I want  
15 to be very clear about that.

16 A. I understand.

17 Q. And we know that you were the chair  
18 of the Cuyahoga County Opiate Task Force, right?

19 A. Correct.

20 Q. And you took that position in 2010,  
21 right?

22 A. Correct.

23 Q. And over the course of the years that  
24 you've been in that position, you've presented  
25 on the nature and scope of the opiate -- opiate

1 MR. SMITH: Objection; form.

2 A. I don't recall a specific date.

3 Q. You don't need to identify a specific  
4 date. That would be really hard, if not  
5 impossible.

6 Can you generally say when you first  
7 recall having heard that the worrisome trends  
8 that we've talked about earlier today related to  
9 abuse of opioids and overdoses might have been  
10 driven by the increased prescribing by licensed  
11 physicians of prescription opioid medications?

12 MR. SMITH: Objection; form.

13 A. 2009 report from the Ohio Department  
14 of Health.

15 Q. Do you remember the name of that  
16 report?

17 MR. SMITH: Objection; form.

18 A. I do not off the top of my head.

19 Q. Does the Cuyahoga County Board of  
20 Health prepare and issue to the public an annual  
21 report?

22 MR. SMITH: Objection; form.

23 A. An organizational annual report, yes,  
24 it does.

25 Q. For how long has the Cuyahoga County

1 spelling and grammar, would you have reviewed  
2 this section for substantive content and  
3 accuracy?

4 MR. SMITH: Objection; form.

5 A. Yes.

6 Q. This 2010 annual report indicates  
7 that there was an alarming trend in Ohio -- I'm  
8 looking in the very first sentence.

9 A. Uh-huh.

10 Q. -- in terms of an increase in  
11 prescription drug abuse and overdose. Do you  
12 see that?

13 A. I do.

14 Q. And then it references this campaign  
15 that we talked about earlier, "Prescription for  
16 Prevention: Stop the Epidemic." Do you see  
17 that?

18 A. I do.

19 Q. Is that an Ohio Department of Health  
20 campaign?

21 MR. SMITH: Objection; form.

22 A. Yes.

23 Q. Did Cuyahoga County Board of Health  
24 have some role with respect to the Ohio  
25 Department of Health campaign entitled

1 "Prescription for Prevention: Stop the  
2 Epidemic"?

3 A. Yes.

4 Q. What was CCBH's role with respect to  
5 this particular campaign?

6 MR. SMITH: Objection; form.

7 A. I mentioned to you earlier it was the  
8 relationship with ODH and I think it was  
9 FleishmanHillard to create awareness in Cuyahoga  
10 County about the possibilities or which  
11 currently taking place in Ohio as it related to  
12 the opioid epidemic.

13 Q. It's obviously referenced in a 2010  
14 report.

15 Do you know if this campaign had  
16 already been launched prior to 2010?

17 A. Yes. This -- we talked about this  
18 morning it was 2009 or 2010 when the  
19 Prescription for Prevention came out.

20 Q. With respect to the term "epidemic"  
21 that is in the title of this campaign, what is  
22 your understanding about what the word  
23 "epidemic" refers to in this context?

24 A. I would say an increase in morbidity  
25 or mortality related to infectious disease or